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UNITED STATES DISTRICT COURT - NORTHERN DISTRICT OF CALIFORNIA

TETYANA DORSANEO,
Plaintiff,

vs.

EDWARD DORSANEO,
Defendant

Case No.: 3:17 – CV – 00765

DECLARATION OF DEFENDANT
EDWARD DORSANEO
SUPPORTING OPPOSITION TO
PLAINTIFF’S MOTION FOR SUMMARY
JUDGMENT

Date: February 1, 2018
Time: 10:00am
Dept: Courtroom 2 / 17th Floor
Judge: Hon. Vince Chhabria

I, Edward Dorsaneo, am the Defendant in this case. I declare and state as follows, and if called to testify, would competently testify to the same of my own personal knowledge:

1. I am a decorated veteran of the US Army, and a former Police Officer, sworn to defend the Constitution of the United States of America.
2. The Superior Court of California for Sonoma County entered a final judgment of dissolution of my short marriage to the Plaintiff on May 20, 2014.
3. That final judgment says that there will be “No Spousal Support by either party”, and that the Court has no further jurisdiction to award spousal support.
4. I have relied on that understanding of that final judgment in all of my actions since that time. I am recognized as a highly principled individual who faithfully keeps his agreements.
5. I have no idea why we are here before this Court for something I thought was concluded nearly 4 years ago – it makes no sense to me.

DECLARATION OF DEFENDANT EDWARD DORSANEO SUPPORTING OPPOSITION
TO PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT
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1 6. I have ample evidence, in the form of documents, to impeach many of the sworn statements
2 made by the Plaintiff, including those statements she made on her I-485 petition, and I want
3 my day in Court, with a jury, to demonstrate her complete and utter lack of credibility, and
4 her willingness to lie to me, the jury, and this Court.

5 7. I have withdrawn and revoked my petition in support of the Plaintiff's Application to Adjust
6 her Status to that of a permanent resident. I have also withdrawn and revoked my Affidavit
7 of Support [form I-864], to the extent that it became or continues to be effective in any
8 manner. Exhibit 1 attached hereto is a true and accurate copy of that withdrawal.

9 8. I have already been borrowing money to pay legal fees and it will already take years to pay
10 back those loans on the pension income I have available to me.

11 9. The first notice I had of this case was a demand letter from Mr. Winter in the amount of
12 approximately \$180,000 which including an un-endorsed copy of the complaint. I thought
13 the letter was from a scam artist and did not pay attention to it at that time. Shortly
14 thereafter, I received service and summons in this case, and located and paid for the services
15 of an attorney to respond.

16 10. I am experiencing health problems, stress, anxiety, worry, and losing sleep as a result of the
17 allegations in this complaint which are repugnant to the sensibility and violate my
18 understanding of the laws I am sworn to uphold. She is asking for a lifetime of indentured
19 servitude for a mistake I made, my marriage, that lasted only for a few weeks. The
20 settlement conference statement prepared by my attorney accurately represents my
21 understanding of the law and my feelings on the obligations I never agreed to with. I have
22 attached a true and accurate copy of that statement hereto as Exhibit 2.

23 11. At the settlement conference, Mr. Winter offered a demand of \$190,000, plus an additional
24 \$85,000 for his "attorney fees", despite the fact that the complaint only asks for about

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1 \$40,000 and the new motion for summary judgment asks for about \$56,000. In my mind, his
2 offer was a “stick up” job, and not offered in good faith.

3 12. At that time, I resolved to investigate my ex-spouse to the best of my abilities, and
4 commenced a more thorough background check of her in her hometown of Kiev, Ukraine. I
5 provided photographs and other personal information to various investigators. That
6 background check produced a statement that my ex-spouse “Tetyana” had been known in
7 prostitution circles as “Elena” working for a firm known as Gia Escorts. I was devastated
8 and distraught -- there is no way I would have married her if I had known that she was a
9 prostitute. I was angry and have been very depressed since that time and did not pursue
10 further investigation.

11 13. Upon receipt of the current proposed motion for summary judgment, I decided to pursue the
12 investigation further and contacted Scott Filley, a private investigator.

13 14. I gave Scott the basic information I had from the previous investigation, and within minutes
14 he was able to produce a photo of Tetyana from an online archive of the website of Gia
15 Escorts under the label of “Elena”. My worst fears were confirmed and I feel so ashamed. I
16 have attached a copy of Scott’s report hereto as Exhibit 3.

17 15. I will be providing the results of this investigation to active law enforcement officers with
18 respect to the sworn statement under oath Tetyana made on her I-485 form, denying any prior
19 involvement in prostitution. She has committed a crime against this country, and a crime
20 against me, and she must be held accountable under law.

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1 I swear under the penalties of perjury that the foregoing is true and correct and that this
2 declaration was executed on January 18, 2018.

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4 /s/ Edward Dorsaneo
Edward Dorsaneo
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